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## IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF NEW JERSEY

NOVARTIS PHARMACEUTICALS	)
CORPORATION,	)
Plaintiff,	) DOCUMENT ) ELECTRONICALLY FILED
v.	) Civil Action No. 13-cv-1028-SDW-MCA
ACTAVIS LLC; APOTEX, INC.;	<i>)</i> )
APOTEX, CORP.; GLAND PHARMA	)
LTD.; DR. REDDY'S LABORATORIES,	)
INC.; DR. REDDY'S LABORATORIES	)
LTD.; EMCURE PHARMACEUTICALS	)
USA, INC.; EMCURE	)
PHARMACEUTICALS, LTD; HOSPIRA,	)

INC.; PHARMACEUTICS	)
INTERNATIONAL INC.; SAGENT	)
PHARMACEUTICALS, INC.; ACS	)
DOBFAR INFO S.A.; STRIDES, INC.;	)
AGILA SPECIALTIES PRIVATE LTD.;	)
SUN PHARMA GLOBAL FZE;	)
CARACO PHARMACEUTICAL	)
LABORATORIES, LTD; SUN	)
PHARMACEUTICAL INDUSTRIES	)
LTD.; WOCKHARDT USA LLC; and	)
WOCKHARDT LTD.	)
Defendants.	)

# DECLARATION OF KAREN A. CONFOY IN SUPPORT OF WOCKHARDT USA LLC AND WOCKHARDT LTD.'S MOTION TO DISMISS COUNT II OF THE CORRECTED AMENDED COMPLAINT

### I, KAREN A. CONFOY, hereby declare as follows:

- 1. I am counsel for Defendants Wockhardt USA LLC and Wockhardt Limited (collectively "Wockhardt") in the above-captioned action and in Civil Action No. 12-3967 (SDW/MCA). I submit this declaration in support of Wockhardt's Motion to Dismiss Count II of the Corrected Amended Complaint.
- 2. I am an attorney at law admitted to practice before the United States District Court for the District of New Jersey. I am a partner at Fox Rothschild, LLP. Unless otherwise stated, the facts set forth in this declaration are true and of my own personal knowledge, and, if called upon to do so, I could and would testify competently to them.
- 3. Attached hereto as **Exhibit 1** is a true and correct copy of Novartis Corp., Novartis Pharmaceuticals Corp., and Novartis AG's Disclosure of Asserted Claims in Civil Action No. 12-3967 (SDW/MCA), served on October 12, 2012.

4. Attached hereto as **Exhibit 2** is a true and correct copy of the Order Denying Plaintiffs' Motion for Leave to Amend Responses to Defendants' Invalidity Contentions in *Astrazeneca AB v. Dr. Reddy's Labs Inc.*, C.A. No. 11-2317-JAP-DEA (D.N.J. Mar. 18, 2013).

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Dated: March 27, 2013 /s/ Karen A. Confoy

Karen A. Confoy kconfoy@foxrothschild.com

Counsel for Wockhardt USA LLC and Wockhardt Limited